

## Sample RMP/PSM Filing And Document Control/Circulation Policy

- The plant shall maintain a separate RMP/PSM filing system
- Separate files will be maintained for each RMP/PSM element, with sub-files for each heading as listed below.

### 1. Employee Participation

- 1.1 **Correspondence**
- 1.2 **Employee Participation Plan** – Excerpted from the PSM Manual
- 1.3 **Employee Circulation Sheet** – A Listing of all employees at the site and a signature block for each. This document will be used to document that employees have been provided the opportunity to review key PSM information; i.e. completed audit reports are to have a copy of this sheet attached to their cover page, followed by circulation to employees. Employees will initial the sheet upon review of the document, prior to filing the document appropriately.

### 2. Process Safety Information

- 2.1 **Correspondence**
- 2.2 **MSDS Sheets** – may be kept outside of this file, as long as the file contains a reference indicating location of the MSDS sheets
- 2.3 **Inadvertent Mixing** – A compilation of the possible hazardous effects of inadvertently mixing chemicals kept on site. This file may be empty if there are no hazardous effects of inadvertent mixing, or if MSDS sheets contain this information. A note to either effect must be placed in this file
- 2.4\* **Process Flow Diagrams/Block Flow Diagrams**
- 2.5 **Process Chemistry**
- 2.6 **Maximum Intended Inventory** – of plant tanks
- 2.7 **Safe Operating Limits** – for process control parameters
- 2.8 **Deviation Consequences** – of operating outside of acceptable limits; note that information in files 2.7/2.8 may be combined, as long as there is appropriate reference as to the location of the information not kept separately in its file
- 2.9 **Materials Of Construction** – this file may be blank, due to inclusion of such information on P & ID's and in equipment files. The file will contain at least a statement indicating where such data/information may be found
- 2.10 **P & ID's** – a full set of all plant P & ID's
- 2.11 **Electrical Classification** – An electrical classification drawing of the facility
- 2.12 **Relief Systems** – The design bases and details of all relief systems. This file may be blank, due to location of this information in individual equipment files. The file will contain at least a statement indicating where such data/information may be found
- 2.13 **Ventilation System Design** – This file may be blank if there are no ventilation systems in place. The file will contain at least a statement indicating such is the case for the facility in question
- 2.14 **Design Codes/Standards** – A summary of the design codes and standards used for facility design. Information may be in summary form; i.e. storage tanks 102 and 103 were designed to API 650, piping per ANSI B31.3; pressure vessels 401 and 402 to ASME section VIII, etc.

- 2.15\* **Material/Energy Balances** – for all processes constructed after 27 May 1992. Note that file may be blank, as M & E information is normally included on PFD's. The file will contain at least a statement indicating whether or not an M & E is required according to the age of the plant, or where such data/information may be found if not stored in the file
- 2.16 **Safety Systems** – A description of site safety systems to include interlocks, detection/suppression systems, etc.
- 2.17 **Plot Plan** – A plan view drawing of the site highlighting significant/pertinent safety features, including egress routes, safety systems, etc.
- 3. **Process Hazard Analysis**
  - 3.1 **Correspondence**
  - 3.2 **PHA Reports**
  - 3.3 **PHA Action Item Reports** – Listings of action items and status reports
- 4. **Operating Procedures**
  - 4.1 **Correspondence**
  - 4.2 **Standard Operating Procedures** – The step-by-step operating procedures for the site. This file may be blank, due to location of procedures elsewhere. The file will contain at least a statement indicating where such procedures may be found
- 5. **Training**
  - 5.1 **Correspondence**
  - 5.2\* **Master Exams**  
Sub-jackets: Exams by process/type – written, sketch
  - 5.3\* **Master Exam Answer Keys**  
Sub-jackets: Answer Keys by process/type – written, sketch
  - 5.4\* **Training Records** – Individual training records on each employee, including exam results
  - 5.5 **Training Materials**  
Sub-jackets – Key process equipment by process  
Sub-jackets – Raw materials, intermediates, final products by process  
Sub-jackets – Chemical hazards by process  
Sub-jackets – Key operating variables and limits by process  
Sub-jackets – Safety equipment systems/descriptions by process  
Sub-jackets – Emergency systems descriptions by process
  - 5.6 **Employee Authorization Forms**  
Sub-jacket – Completed Authorization forms  
Sub-jacket – Blank Authorization forms
  - 5.7 **Refresher Training Frequency List**
  - 5.8 **Blank Performance Test Record Forms**
- 6. **Contractors**
  - 6.1 **Correspondence**
  - 6.2 **List Of Approved Contractors**
  - 6.3 **Contractors Safety Briefing/Checklist**
  - 6.4 **Contractor Injury/Illness Log**
  - 6.5 **Individual Contractor Files – By Contractor; Include:**

- Sub-jacket: OSHA 200 Log
- Sub-jacket: Completed Safety Briefing/Checklist and safety exam results
- Sub-jacket: Contractor bid/safety evaluation form
- Sub-jacket: Contractor safety compliance audit
- 6.6 **Contractor Bid/Safety Evaluation Form**
- 6.7 **Contractor Safety Compliance Audit**

## 7. **Pre-Start-up Safety Review (PSSR)**

- 7.1 **Correspondence**
- 7.2 **PSSR Checklists/Form – Blank**
- 7.3 **PSSR Checklist/Form – Completed** - PSSR Checklist/Forms can be kept with the associated Management of Change paperwork. The file will contain at least a statement indicating where the completed checklists can be found

## 8. **Mechanical Integrity (MI)**

- 8.1 **Correspondence**
- 8.2 **MI Covered Process Areas**
- 8.3 **MI Procedures** - This file may be blank, due to location of this information elsewhere. The file will contain at least a statement indicating where such procedures may be found
- 8.4 **Frequency Requirements** – This file will contain a summary of covered equipment, the type of inspection/test required, the frequency of inspection/test required, and the basis for the frequency
- 8.5 **Inspection/Test Results**
  - Sub-jacket: Monthly tests/reports:
    - Monthly tank/vessel inspection
    - Monthly Rotating Equipment Inspection
    - Alarms/Sensors – record outside the PSM filing system in our general plant safety system in the “Monthly Safety Reporting Form”
    - Quarterly Relief Device Inspection
    - Quarterly Controls/As Possible Interlock Inspection
  - Sub-jacket: Infrequent/Special Inspection/test records – For infrequent inspections
  - Sub-jacket: Action Log – this file will be used to document any corrective action taken as the result of an inspection/test
- 8.6 **Equipment List** – a compiled listing of all active pressure vessels, storage tanks, and rotating equipment in service at the site and subject to inspection
- 8.7 **Controls List** – a list of main controls subject to quarterly test

## 9. **Hot Work Permits – All Issued**

- 9.1 **Correspondence**
- 9.2 **Blank Permits**
- 9.3 **Completed Permits**

## 10. **Management Of Change (MOC)**

- 10.1 **Correspondence**
- 10.2 **Blank MOC Forms**
  - Sub-jacket: MOC Form

- Sub-jacket: Minor Mechanical/Information/Set-point Only Checklist
  - Sub-jacket: Engineering/Mechanical Checklist
  - Sub-jacket: "What If" Safety Review Checklist
- 10.3 **Completed MOC Forms**

**11. Incident Investigation (II)**

- 11.1 **Correspondence**
- 11.2 **Blank II Forms**
- 11.3 **Completed II Forms**
- 11.4 **Action Item Reports** – This file will contain all RMP/PSM incident reports

**12. Emergency Planning And Response (ERP)**

- 12.1 **Correspondence**
- 12.2 **ERP** – this file will contain a hardcopy of the ERP, or a reference as to its location
- 12.3 **Small Release Procedures** – a compilation of the small release containment/control procedures required as part of the plan; this file may be blank as long as it references the location of these procedures, usually found in the ERP.

**13. Compliance Audits**

- 13.1 **Correspondence**
- 13.2 **Audit Reports**
- 13.3 **Action Item Reports** – This file will contain all tracking/status reports on any audit action items

**14. Trade Secrets**

- 14.1 **Correspondence**
- 14.2 **Confidentiality Agreement – Blank – if any**
- 14.3 **Confidentiality Agreement – Completed, if any** – This file will be used to hold signed confidentiality agreements, or a reference as to their location

**15. Risk Management Plan Specific Information (RMP Binder)**

- 15.1 **Copy of the most current plan which includes:**
  - Registration Information
  - Worst-case release scenario analysis
  - Alternative release scenario analysis
  - Off-site impacts including
    - Population
    - Environment
  - 5 year Accident History
  - Prevention Program
  - Emergency Response information
  - Executive Summary
- 15.2 **Copy of any plan updates**
- 15.3 **Appendices of backup information**
  - Scenario descriptions, estimated quantity released, rate, duration
  - Methodology used to determine distance to endpoint

- Data used to estimate population and environmental receptors
- Coordination with local emergency responders

#### **15.4 Management System**

- Document identifying person or position with overall responsibility of the risk management program
- Document other persons responsible for implementing individual requirements of the risk management program

Plant management will make appropriate use of the employee circulation sheet (file 1.4). This sheet will be attached to key RMP/PSM documents for circulation to employees, to assure their review of important PSM information. Most critical use will be with any MOC form, any PHA report, any audit report and any tracking/follow-up reports.

Employees are to affix their signature to the circulation sheet upon their receipt/review of the appropriate document. Following circulation, the document, with the circulation sheet attached, will be retained in the appropriate file.